

## **REMARKS**

Reconsideration of the present application is respectfully requested in view of the following remarks. Prior to entry of this response, Claims 1-3, 6-8, 10-14, 16-19, 21, and 24-27 were pending in the application, of which Claims 1, 10, 19, and 27 are independent. In the Final Office Action dated October 19, 2007, Claims 1-3, 6-8, 10-14, 16-19, 21, and 24-27 were rejected under 35 U.S.C. § 103(a). Following this response, Claims 1-3, 7-8, 10-14, 16-19, 21, and 24-27 remain in this application with Claim 6 being cancelled without prejudice or disclaimer. Applicants hereby address the Examiner's rejections in turn.

### **I. Interview Summary**

Applicants thank Examiner Rutledge for the courtesy of a telephone interview on November 19, 2007, requested by the undersigned to discuss the rejection of the current claims under 35 U.S.C. § 103(a). During the interview, the Examiner stated that the amended claims appeared to overcome the first cited reference, *Beauregard*, but recommended differentiating the active marks in *Storisteanu* from the claimed embedded semantic categories. No agreement was reached regarding patentability.

### **II. Information Disclosure Statements**

In the Final Office Action dated October 19, 2007, Examiner stated that the Supplemental Information Disclosure statements filed 07/27/2007, 06/25/2007, and 09/27/2007 were not considered because they were illegible. Applicants respectfully

submit replacement copies of the Supplemental Information Disclosure Statements for the Examiner's consideration.

### III. Rejection of the Claims Under 35 U.S.C. § 103(a)

In the Final Office Action, the Examiner rejected Claims 1-3, 6-8, 10-14, 16-19, 21, and 24-27 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,974,413 ("*Beauregard*") in view of U.S. Patent No. 6,976,209 B1 ("*Storisteanu*"). Independent Claims 1, 10, 19, and 27 have been amended, and Applicants respectfully submit that these amendments each overcome this rejection and add no new matter.

Amended Claim 1 is patentably distinguishable over the cited art for at least the reason that it recites, for example, "embedding the plurality of semantic categories in the electronic document." Amended Claims 10, 19 and 27 each includes a similar recitation. Support for these amendments can be found in the specification at least on page 16, line 16, through page 17 line 15.

In contrast, *Beauregard* at least does not teach or suggest the aforementioned recitation. As the Examiner stated, *Beauregard* does not teach either compiling the labels into semantic categories or transmitting the semantic categories to the application program module. (See Office Action, page 14, lines 13-15.) Further, *Beauregard* does not teach embedding the semantic categories within a document. Rather, *Beauregard* teaches storing the semantic information in a separate database that must be downloaded on each computer where a user will work on the document. (See *Beauregard*, col. 5, line 57 through col. 6, line 3.)

Furthermore, *Storisteanu* does not overcome *Beauregard*'s deficiencies. As the Examiner stated, *Storisteanu* merely discloses storing text from an editing program in a DLL after it has been entered in an electronic document. (See Office Action, page 14, lines 16-20, and *Storisteanu*, col. 22, lines 1-65.) *Storisteanu* states that no change is needed in the processes source file, nor its extended attributes, or in another file associated with it because all functionality is handled by the live parser manipulating the document. (See *Storisteanu*, col. 10, lines 20-30.) In *Storisteanu*, the MARK SET command assigns the specified <markname> to a certain position or text in the document. A SET MARK.COMMAND is used to set the command binding of a mark. (See *Storisteanu*, col. 5, lines 27-34.) The user then invokes this command binding through an explicit command request that runs the command bound to the mark. Like *Beauregard*, *Storisteanu* at least does not teach or suggest embedding semantic categories in the document itself. Rather, *Storisteanu* merely discloses setting marks in the document that can be triggered to run commands bound to that mark.

Combining *Beauregard* with *Storisteanu* would not have led to the claimed invention because *Beauregard* and *Storisteanu*, either individually or in combination, at least do not disclose or suggest "embedding the semantic categories in the electronic document," as recited by amended Claim 1. Claims 10, 19 and 27 each includes a similar recitation. Accordingly, independent Claims 1, 10, 19, and 27 each patentably distinguishes the present invention over the cited art, and Applicants respectfully request withdrawal of this rejection of Claim 1, 10, 19 and 27.

Dependent Claims 2-3, 7-8, 11-14, 16-18, 21, and 24-26 are also allowable at least for the reasons described above regarding independent Claims 1, 10, 19, and 27,

and by virtue of their respective dependencies upon independent Claims 1, 10, 19, and 27. Accordingly, Applicants respectfully request withdrawal of this rejection of dependent Claims 2-3, 7-8, 11-14, 16-18, 21, and 24-26.

#### IV. Conclusion

Applicants respectfully request that this Amendment After Final be entered by the Examiner, placing the claims in condition for allowance. Applicants respectfully submit that the proposed amendments of the claims do not raise new issues or necessitate the undertaking of any additional search of the art by the Examiner, since all of the elements and their relationships claimed were either earlier claimed or inherent in the claims as examined. Therefore, this Amendment should allow for immediate action by the Examiner.

Finally, Applicants respectfully submit that the entry of the Amendment would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

In view of the foregoing remarks, Applicants respectfully submit that the claimed invention, as amended, is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicants therefore request the entry of this Amendment, the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

In view of the foregoing, Applicant respectfully submit that the pending claims, as amended, are patentable over the cited references. The preceding arguments are based only on the arguments in the Official Action, and therefore do not address

patentable aspects of the invention that were not addressed by the Examiner in the Official Action. The claims may include other elements that are not shown, taught, or suggested by the cited art. Accordingly, the preceding argument in favor of patentability is advanced without prejudice to other bases of patentability. Furthermore, the Final Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicant decline to automatically subscribe to any statement or characterization in the Final Office Action.

Please grant any extensions of time required to enter this amendment and charge any additional required fees to our Deposit Account No. 13-2725.

Respectfully submitted,  
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